

1 CLARK COUNTY SCHOOL DISTRICT
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14 **UNITED STATES DISTRICT COURT**
15 **FOR THE DISTRICT OF NEVADA**

16 BRIAN KEITH MALLOW,

17 Case No.: 2:20-cv-00440-JAD-EJY

18 Plaintiff,

19 v.

20 CLARK COUNTY SCHOOL DISTRICT
21 POLICE DEPARTMENT; a political
22 subdivision of the State of Nevada, CCSDPD
23 OFFICER RAYMOND CRUZAN (P#527);
24 DOES I through XX; and, ROE ENTITIES I
25 through XX,

26 **STIPULATION AND PROPOSED
27 ORDER TO EXTEND THE TIME
28 WITHIN WHICH DEFENDANTS MAY
ANSWER OR OTHERWISE RESPOND
TO PLAINTIFF'S COMPLAINT
(FIRST REQUEST)**

29 Defendants.

30 Plaintiff BRIAN KEITH MALLOW ("Plaintiff") and Defendants CLARK COUNTY
31 SCHOOL DISTRICT POLICE DEPARTMENT and CCSDPD OFFICER RAYMOND CRUZAN
32 ("Defendants"), by and through their respective counsel, hereby stipulate and agree pursuant to
33 Local Rule 7-1 as follows:

34 1. Whereas, on March 2, 2020, Plaintiff filed a Complaint for Civil Rights Violation
35 and Injunctive and Declaratory Relief; Demand for Jury Trial before the United States District
36 Court, District of Nevada, designated Case No.: 2:20-cv-00440-JAD-EJY. ECF No. 1.

1 2. Whereas, on May 18, 2020, Plaintiff served a copy of the Summons and Complaint
2 on Defendants Clark County School District Police Department and CCSDPD Officer Raymond
3 Cruzan. ECF Nos. 9 and 10.

4 3. Whereas, Defendants' response to Plaintiff's Complaint is due June 8, 2020. Fed
5 R. Civ. P. 12 (a).

6 4. Whereas, Defendants require additional time to evaluate Plaintiff's allegations and
7 file a proper response; therefore, the parties agree to a two (2) week extension of time through June
8 22, 2020, for Defendants to respond to Plaintiff's Complaint.

9 5. Whereas, this is the first request for an extension regarding the filing of Defendants'
10 response to Plaintiff's Complaint, which is made in good faith, not for the purposes of delay, and
11 neither party is prejudiced by the short extension.

12 DATED: June 5, 2020

13 CLARK COUNTY SCHOOL DISTRICT
14 OFFICE OF THE GENERAL COUNSEL

15 By: /s/ Crystal J. Herrera
16 Crystal J. Herrera, Esq. (#12396)
17 5100 West Sahara Avenue
18 Las Vegas, NV 89146
19 Attorney for Defendants

20 DATED: June 5, 2020

21 MUELLER & ASSOCIATES, INC.

22 By: /s/
23 Craig A. Mueller, Esq. (#4703)
24 723 S. Seventh Street
25 Las Vegas, NV 89101
26 Attorney for Plaintiff

27 **ORDER**

28 **IT IS SO ORDERED.**

29 
30 UNITED STATES MAGISTRATE JUDGE
31 DATED: June 5, 2020